

From purchase to repair: how Bill 29 reshapes consumer rights in Québec

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On October 5, 2025, substantial amendments to the *Québec Consumer Protection Act* (QCPAA) and the *Regulation respecting the application of the Consumer Protection Act* (Regulation) in relation to goods requiring maintenance, will take effect. These changes introduce new and more rigorous obligations for merchants and manufacturers regarding the availability of replacement parts, repair services and information necessary to maintain or repair the goods.

The primary aim of these amendments is to reinforce consumer rights by promoting product durability, reparability and maintenance, while directly addressing the issue of planned obsolescence. This Update provides a detailed overview of the amendments, with a focus on the enhanced warranty and disclosure obligations for goods requiring maintenance, further to the publication on June 25, 2025 of the *Regulation to amend the Regulation respecting the application of the Consumer Protection Act*, which specifies the scope of these new obligations.

Background and legislative context

The amendments represent the second phase of the implementation of the Bill 29 — *Act to protect consumers from planned obsolescence and to promote the durability, reparability and maintenance of goods* (Bill 29). This Bill aims to prohibit planned obsolescence of products and to strengthen consumers' rights regarding the durability, reparability and maintenance of certain goods. The amendments establish more stringent obligations for manufacturers and merchants, with the objective of ensuring that consumers have improved access to the resources needed to maintain and repair their purchases.

Current legal framework

Prior to these amendments, section 39 of the QCPAA required merchants to ensure the availability of replacement parts and repair services for a reasonable period after the sale of goods, unless this obligation was expressly disclaimed. This requirement applied to goods of a nature that requires maintenance. Case law under this provision has established that products such as televisions, computers, home appliances, furniture, electric razors, and vehicles (including electric scooters) fall within this category.

Key changes introduced by the amendments

1. Broadened definition of goods requiring maintenance

The amended section 39 of the QCPAA sets out a new definition of the scope of goods subject to maintenance obligations, which will now cover “goods whose use may require the replacement, cleaning or updating of one of their components”, potentially broadening the range of goods subject to the durability and repairability requirements.

2. Enhanced disclosure requirements

Sections 79.18 and 79.19 of the Regulation, effective October 5, 2025, introduce new disclosure obligations for manufacturers and merchants:

- Online disclosure: manufacturers and merchants must clearly and prominently disclose online whether they fully, partially, or do not guarantee the availability of replacement parts, repair services, or information necessary for maintenance or repair.
- Partial guarantees: if only partial availability is guaranteed, information making it possible to easily identify which parts, services, or information are not guaranteed to be available must be provided.
- Online transactions: for online sales, merchants must display the manufacturer’s disclosure information in close proximity to the product listing, accompanied by a hyperlink to the manufacturer’s disclosure concerning the availability of replacement parts, repair services and information necessary for maintenance or repair.

3. Form requirements

To ensure consumers can easily access and retain the required information:

- disclosures must be easily retained and printable in paper form. A hyperlink to a downloadable PDF is recommended, and the link must be prominently displayed on the product or checkout page.
- if a user or maintenance manual is provided, the required information must also be included in a clear and prominent manner.
- where the merchant is also the manufacturer, a single disclosure suffices, but the information must still be included in any user or maintenance manual provided.

4. Scope of exception regarding the new prohibition to use a technique that makes it more difficult to maintain or repair goods

Bill 29 introduces a new prohibition in section 227.0.3 of the QCPAA, for manufacturers and merchants to “use a technique that has the effect of making it more difficult for the consumer [...] to maintain or repair goods”. The Regulation now sets out the applicable exemptions for this new prohibition, namely where manufacturers and merchants can demonstrate that a specific technique is

- the only means to protect the consumer or person conducting maintenance or repair for the consumer from a grave, serious, direct, and immediate risk to their safety (except where the person carrying out the maintenance or repair is a professional repair or

maintenance provider) or

- necessary to ensure compliance with an applicable law or regulation

Practical implications and next steps

These new requirements will come into force on October 5, 2025. Manufacturers and merchants are advised to review and update their practices well in advance to ensure compliance. This includes assessing current disclosure processes, updating product pages and manuals to include required information, and implementing systems to meet the form and accessibility requirements.

These amendments reflect a broader tendency toward stronger consumer protections in Québec. For businesses operating in Québec, understanding and implementing these changes is essential to ensure compliance.

We are here to help you navigate the changes brought by the amendments set above and support you in keeping your business compliant with Québec consumer protection laws. Please do not hesitate to contact us if we can provide any assistance or guidance on your operations in Québec.